

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

THOMAS R. BOBO

*Plaintiff,*

v.

HARTFORD LLOYDS INSURANCE  
COMPANY

*Defendant.*

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CIVIL ACTION NO. 4:19-cv-2173

**NOTICE OF REMOVAL**

Defendant Hartford Lloyds Insurance Company (“Hartford”), pursuant to 28 U.S.C. §§ 1441 and 1446, files this Notice of Removal of the captioned action, Cause No. 19-05-07232; *Thomas R. Bobo v. Hartford Lloyds Insurance Company*; In the 410<sup>th</sup> Judicial District Court, Montgomery County, Texas. In support of this Notice of Removal, Hartford respectfully submits the following:

1. Thomas R. Bobo (“Plaintiff”) filed his Original Petition on May 24, 2019, in the 410<sup>th</sup> Judicial District Court of Montgomery County, Texas. Hartford was served on May 31, 2019.
2. Hartford has requested certified copies of all process, pleadings, and orders from the 410<sup>th</sup> Judicial District Court of Montgomery County. A list of the documents contained in that file is included for the Court’s review.
3. The Petition alleges that Plaintiff is an individual residing in Texas.<sup>1</sup> The Petition alleges that Hartford is “an insurance company doing business in the State of Texas”<sup>2</sup> In fact, Hartford is a Connecticut corporation with its principal place of business in Hartford, Connecticut.

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<sup>1</sup> Petition, ¶ 1.

<sup>2</sup> Petition at ¶ 2.

4. Plaintiff seeks monetary relief over \$100,000, but not more than \$200,000.<sup>3</sup>
5. Hartford does not admit the underlying facts as alleged by Plaintiff in his Original Petition or as summarized above. Hartford expressly denies that it has any liability to Plaintiff.
6. This Notice of Removal is filed within 30 days of service of the Original Petition and is therefore timely under 28 U.S.C. § 1446(b).

### **DIVERSITY JURISDICTION**

7. This Court has original jurisdiction pursuant to 28 U.S.C. § 1332 (a), and this matter is removable to this Court pursuant to 28 U.S.C. § 1441(a), because there is complete diversity of citizenship between the parties and the amount in controversy exceeds \$75,000 exclusive of interest and costs. Plaintiff is a resident of Montgomery County, Texas. Hartford is incorporated in Connecticut with its principal place of business in Connecticut.
8. The amount in controversy exceeds the jurisdictional minimum of \$75,000 set by 28 U.S.C. § 1332(a). In the Original Petition, Plaintiff alleges he seeks monetary relief “over \$100,000, but not more than \$200,000.”<sup>4</sup>

### **REMOVAL PROCEDURE**

9. The clerk of the 410th Judicial District Court of Montgomery County, Texas has been provided notice of this Removal.
10. The following exhibits are attached to this notice and incorporated here by reference:
  - a. Index of matters being filed;
  - b. List of all parties and counsel of record; and
  - c. Copies of pleadings, process, and orders requested from the 410<sup>th</sup> Judicial District County of Montgomery County, Texas.<sup>5</sup>

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<sup>3</sup> Petition at ¶ 4.

<sup>4</sup> Petition at ¶ 4.

<sup>5</sup> The state court file has been requested. We have attached copies of the documents from the state court file that are in our current possession. This Notice will be supplemented with the actual state court file on receipt.

**CONCLUSION**

12. Based on the foregoing, the exhibits submitted in support of this removal, and other documents filed contemporaneously with this Notice of Removal, Hartford hereby removes this case to this Court for trial and determination.

Respectfully submitted,

/s/ Martin R. Sadler

Martin R. Sadler

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 17th day of June, 2019, a copy of the foregoing has been served upon all counsel of record in this action by ECF Filing and/or facsimile, properly addressed to:

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*/s/ Martin R. Sadler*

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Martin R. Sadler